



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, Third Floor  
New York, New York 10007*

August 19, 2021

**By ECF**

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Center for Biological Diversity, et al. v. U.S. Fish and Wildlife Service, et al.*, 21  
Civ. 5706 (LJL)

Dear Judge Liman:

With Plaintiffs' consent, I write respectfully, on behalf of Defendants, to request a 30-day extension of the September 7, 2021, deadline to respond to the complaint, along with corresponding adjournments of the September 8, 2021, initial conference and September 1 deadline for pre-conference submissions.

The reason for the request is that I will be on annual leave from August 30, through September 12, when the response to the complaint and the pre-conference submissions are due and when the conference is to occur. Further, this complaint raises technical matters that require additional consultation with the agency counsel assigned to the case. Finally, the parties are currently discussing potential settlement of this matter, and an extension of time to answer and an adjournment of the initial conference may allow sufficient time for these discussions to occur.

Should the Court grant the requests, the Government's response to the complaint will be due on October 7, 2021. The Government proposes rescheduling the initial conference for some time after this date, with pre-conference submissions due one week before the conference. For purposes of rescheduling, I respectfully request that the conference not be scheduled after 1 p.m. on October 19, 2021.

This is the Government's first request for an extension of time to respond to the complaint and first request for an adjournment of the initial conference and pre-conference submissions. Counsel for Plaintiff consents to the requests.

Respectfully submitted,

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Southern District of New York

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